

**Summit County  
County Courthouse  
Coalville, UT 84017**

March 23, 2005

Secretary  
Federal Communications Commission  
Washington, DC 20554

RE: Petition to remove LPTV application BNPTT-20000831CMI from  
Auction 81, Group MX229

Ladies and Gentlemen:

As explained in the attached "Engineering Statement" the subject application was amended during the August 2001 settlement window to clear the conflicts with the other applications in this group.

I believe it is not necessary for my application to be in the auction as there is neither an incoming or outgoing conflict.

Please reclassify my application as a "singleton".

Respectfully submitted

s/s Ron Titcomb  
Translator Coordinator

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**ENGINEERING STATEMENT IN SUPPORT OF THE  
PETITION OF SUMMIT COUNTY TO BE REMOVED  
FROM AUCTION 81, GROUP MX229**

Introduction

Application BNPTT-20000831CMI has been included in MX229 in spite of the unilateral engineering changes filed in a settlement window to clear the conflicts with the other applications in this group.

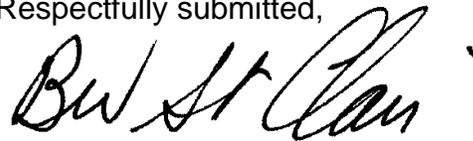
Incoming Interference:

The application contains a statement added in the August 2001 settlement window to the effect that the applicant will accept interference from the other applicants in this group. This amendment was filed on 8/23/2001. See paragraph #4, Conclusion.

Discussion

The applicant by unilateral changes and additions to the application during a settlement window has cleared both outgoing and incoming conflicts. Thus it should not be in an auction with the other applicants in MX229.

Respectfully submitted,



B. W. St. Clair  
Engineering Consultant  
March 23, 2005

Name	Relationship to Applicant (e.g., Consulting Engineer) ENGINEERING CONSULTANT	
Signature	Date 8/23/2001	
Mailing Address		
City	State or Country (if foreign address)	Zip Code
Telephone Number (include area code)	E-Mail Address (if available)	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

**Exhibits**

**Exhibit 1**

**Description:** SECTION III, EXHIBIT 6, M193

THIS APPLICATION MODIFICATION PROVIDES AN EXHIBIT CONTAINING ADDITIONAL INTERFERENCE STUDY INFORMATION RESPONSIVE TO QUESTION 13 IN THE TECH SECTION IN ORDER TO ALLOW IT TO BE REMOVED FROM THE AUCTION GROUP M193, AUCTION 81 AND TREATED AS A SINGLETON APPLICATION.

**Exhibit 6**

**Description:** SECTIOPN III, EXHIBIT 6, M193

ENGINEERING EXHIBIT - INTERFERENCE ANALYSIS  
 IN RE: APPLICATION FOR LOW POWER TELEVISION BROADCAST STATION LICENSE, AUGUST, 2000 WINDOW  
 AUCTION NUMBER 81, ENGINEERING SOLUTION TO SEPARATE THIS APPLICATION FROM MUTUALLY EXCLUSIVE GROUP

1. INTRODUCTION

GROUP: M193

APPLICANT:M193 UT 23 WOODLAND & KAMAS SUMMIT COUNTY BNPTT20000831CMI

CONFLICTING APPLICATIONS HAVING ONE OR MORE OVERLAPPING PROTECTED/INTERFERING CONTOURS PER PUBLIC NOTICE DA-0129:

M193 UT 23 HEBER CITY UTAH COMMUNICATIONS,/ LL BNPTT20000831AWS

M193 UT 23 PARK CITY AIRWAVES BROADCASTING,/ BNPTTL20000815ACB

M193 UT 23 TOOLE R & D MEDIA GROUP, INC./ BNPTTL20000831EEL - WITHDRAWN

2. DISCUSSION

ALTHOUGH THERE ARE ONE OR MORE OVERLAPPING PROTECTED V. INTERFERING CONTOURS BETWEEN THIS APPLICATION AND OTHER APPLICATIONS AS SHOWN ABOVE, WITH THE CHANGE OF OFFSET TO (-) THEY WERE SUBJECTED TO AN ANALYSIS OF POTENTIAL INTERFERENCE WHICH INCLUDES A LONGLEY-RICE STUDY IN ACCORDANCE WITH OET BULLETIN 69 OF THE ACTUAL PREDICTED INTERFERENCE, INCOMING AND OUTGOING, BETWEEN THIS APPLICATION AND THE IDENTIFIED CONFLICTING APPLICATIONS WITHIN THE SAME AUCTION GROUP. THE FINDINGS ARE SHOWN BELOW.

3. ANALYSIS

INTERFERENCE CAUSED BY THE APPLICANT'S PROPOSED FACILITY TO :

M193 UT 23 HEBER CITY        UTAH COMMUNICATIONS,/ LL BNPTT20000831AWS

M193 UT 23 PARK CITY        AIRWAVES BROADCASTING,/ BNPTTL20000815ACB

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THE APPLICANT HAS ALSO BEEN NOTIFIED THAT  
M193 UT 23 TOOLE R& D MEDIA GROUP, INC./ BNPTTL20000831EEL IS BEING WITHDRAWN.

4. CONCLUSION

NO INTERFERENCE OR INTERFERENCE TO ZERO PERSONS PER OET BULLETIN 69 IS CAUSED TO THE APPLICANT'S PROPOSAL OR THE OTHER PROPOSALS SHOWN ABOVE WHEN THE LONGLEY-RICE STUDY IS USED AS PART OF THE APPLICATION. IN THE EVENT INTERFERENCE WERE TO BE SHOWN INCOMING TO THE APPLICANT, IT IS BELIEVED TO BE INSIGNIFICANT AND IS ACCEPTABLE TO THE APPLICANT. THUS, THIS APPLICATION IS NO LONGER MUTUALLY EXCLUSIVE WITH ANY OTHER IN ITS AUCTION GROUP. ACCORDINGLY, IT IS REQUESTED THAT IT BE REMOVED FROM THE GROUP AND ALLOWED TO PROCEED FORTHWITH TO THE PERMITTING PROCESS.

THERE HAS BEEN NO PAYMENT OR OTHER CONSIDERATION PROVIDED BY EITHER PARTY IN CONNECTION WITH THIS ENGINEERING SOLUTION AND/OR WITHDRAWL.

...END OF EXHIBIT